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1/10/2018

BY ECF

Honorable Robert M. Levy
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Government Employees Insurance Company, et al., v. Bruce Jacobson, et al., Index No. 15-cv-07236*; Joint Motion to Extend Discovery Deadlines

Dear Judge Levy:

We write on behalf of Defendants Bruce Jacobson, D.C., BMJ Chiropractic, P.C., NJ Pain Treatment, P.C., Jacobson Chiropractic, P.C., Dr. Bruce Jacobson DC, P.C., and NJ Neuro & Pain, P.C., and jointly with Plaintiffs to request an extension of the deadlines to complete fact and expert discovery.

The current deadline to complete fact discovery is January 23, 2018 and the current deadline to complete expert discovery is February 5, 2018. The parties jointly request that the fact discovery deadline be extended two months to March 23, 2018 and that the expert discovery deadline be extended to June 23, 2018. Regarding expert discovery, the parties propose the following schedule:

- a. Plaintiffs' reports due by April 23, 2018;
- b. Defendants' reports due by May 23, 2018;
- c. Expert depositions completed by June 23; and
- d. Requests for pre-motion conferences for summary judgment motions submitted by July 23, 2018.

The current deadline for the close of fact discovery is January 23, 2018. The current deadline for the close of expert discovery is February 5, 2018.

This is the seventh request to extend the discovery deadline.

The parties have been actively exchanging documents and information since the last conference with the Court in August of 2017. Due to the sheer volume of

documents produced by Plaintiffs, however, Defendants have not yet been able to fully review Plaintiffs' production. Defendants' review is ongoing and includes the time-consuming on-site inspection of over a hundred thousand individual documents produced by Plaintiffs. In addition to the on-site review, Defendants are currently reviewing hundreds of thousands of pages of documents already produced by Plaintiffs.

Defendants also require this extension to complete their party depositions. In particular, Defendants served co-Defendant Dipti Patel, D.C., a notice of deposition for January 18. Dr. Patel has not yet confirmed that date with counsel and she may seek reschedule the deposition.

Plaintiffs and Defendants named herein therefore respectfully request that the Court extend the deadlines to complete discovery.

Thank you for your consideration of this letter.

Cc: All Counsel via ECF

Respectfully,
/s/ _____
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herein*
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